



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

February 20, 2014

Ms. Yolynda Begay
Coronado Forest Plan Revision
P.O. Box 1919
Sacramento, California 95812

Subject: Draft Programmatic Environmental Impact Statement for Revision of the Coronado National Forest Land and Resource Management Plan, Cochise, Graham, Pima, Pinal, and Santa Cruz Counties, Arizona; Hidalgo County, New Mexico (CEQ # 20130340)

Dear Ms. Begay:

The U.S. Environmental Protection Agency has reviewed the Draft Programmatic Environmental Impact Statement for Revision of the Coronado National Forest Land and Resource Management Plan (Coronado Plan) pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The EPA strongly supports the goals of the Coronado Plan. These goals—including ecosystem restoration and resiliency, and preservation of open space—which are described in the DEIS as the five overarching “needs for change” identified during scoping, seem particularly apt for a forest, such as the Coronado, facing present and future management challenges posed by surrounding development, ongoing and proposed mining activities, and the effects of climate change.

Based on our review of the subject DEIS, we have rated the Preferred Alternative and the document as (LO-1) Lack of Objections – Adequate (see the enclosed “Summary of EPA Rating Definitions”). The EPA recognizes the need for the use of mechanical thinning and prescribed fire and wildfire to achieve long-term restoration objectives. We commend the BLM for committing, in the Preferred Alternative, to strong best management practices and soil and water conservation measures to protect sensitive resources during mechanical harvest and fire treatments.

The EPA commends the Forest Service as well for devoting considerable attention to climate change in the proposed Coronado Plan—both in assessing potential effects (as evidenced by the proposed Finger Rock Canyon Research Natural Area, which would be dedicated to future ecological and climate change monitoring and research), as well as developing novel management strategies to mitigate and respond to these effects (strategies articulated in the detailed and thorough appended planning document “Climate Change Trends and Coronado National Forest Land Management Planning”). We recommend that the Final EIS and Record of Decision include a commitment to mitigate climate change effects, and to adapt management strategies accordingly, for the duration of the Coronado Plan.

We recognize the challenge the Forest Service faces by implementing a land and resource management plan that will rely heavily on prescribed burns and wildfire to achieve project objectives. We commend the Forest Service for acknowledging the potential air quality impacts associated with these treatments by proposing a revised Coronado Plan that identifies “goals and approaches for managing air quality

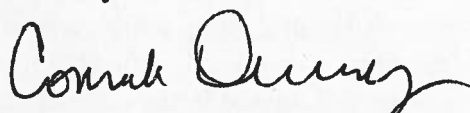
related values in class I areas" (p. 207). Though the Coronado has good air quality, the fine particulate matter generated during wildland fire does present a human health risk. We recommend that the Forest Service implement BMPs and work with Arizona Department of Environmental Quality air quality officials to reduce emissions from prescribed burns and wildfires to the greatest possible extent. We also recommend that the BLM analyze and include a description, in the FEIS, of the potential for further reductions in air emissions, in proposed forest treatments, by lessening or eliminating pile burning of residual fuels in favor of biomass energy production.

We recommend that the Forest Service consider adding wilderness acreage to the Preferred Alternative comparable to the amount included in Alternative 1. The DEIS states that Alternative 1 responds to the five aforementioned "needs for change" in the same manner as reported for the proposed action, but that it "better addresses the need for management direction regarding ecosystem restoration and resiliency by proposing 255,448 acres more than the other alternatives for wilderness management" (p. 36). Considering the management challenges confronting Coronado planners (both currently, and over the life of the revised Plan)—including encroaching development, mining activities, and the effects of climate change, among other pressures—it would seem most prudent to implement a Preferred Alternative with the maximum possible wilderness acreage, thereby ensuring the greatest forest resiliency and maximizing the achievement of restoration objectives.

We also recommend that the Forest Service include additional information, in the FEIS, on how the proposed Rosemont Copper Mine and other mining activities may affect long term Coronado planning objectives. We acknowledge that, as is stated in the DEIS, "this EIS neither evaluates nor provides information in support of a decision to approve any mining-related activity on the Coronado" (p. 434). Nevertheless, the Coronado has abundant locatable mineral resources, with "several large active mines, rock quarry operations, and exploratory mining activities on other Federal, State, and private land in the cumulative effects area" (p. 444). The FEIS should provide additional detail about how these mining activities may affect the major management goals identified in the Coronado Plan—including preservation of open space, protection of sensitive species and riparian habitat, and ecosystem restoration and resiliency—as well as regional air quality and visibility, particularly class I areas in and near the Coronado, including the Chiricahua Wilderness and Saguaro National Park.

We appreciate the opportunity to review this DEIS, and are available to discuss our comments. When the FEIS is released, please send one CD copy to this office (specify Mail Code ENF-4-2). If you have any questions, please contact me at 415-972-3521, or contact Jason Gerdes, the lead reviewer for this project. Mr. Gerdes can be reached at 415-947-4221 or gerdes.jason@epa.gov.

Sincerely,


FOR Kathleen Martyn Goforth, Manager
Environmental Review Section

Enclosure: Summary of EPA Rating Definitions

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment

